

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN DIEGO REGION

CLEANUP AND ABATEMENT ORDER NO. 91-44

THRIFTY OIL COMPANY

STATION NO. 158  
7974 UNIVERSITY AVENUE, LA MESA  
SAN DIEGO COUNTY

The California Regional Water Quality Control Board, San Diego Region (hereinafter Regional Board) finds that:

1. Thrifty Oil Company (hereinafter the discharger) owns property located at 7974 University Avenue in La Mesa, California. The property is currently leased to Arco Products Company which operates a retail gasoline station at the site, however the site is referred to as Thrifty Station No. 158. Attachment 1 to this Order is a location map for this site.
2. By memo dated February 24, 1986, the Hazardous Materials Management Division of the County of San Diego Department of Health Services (hereinafter HMMD) notified the Regional Board that an estimated 25 gallons of fuel were released from the underground fuel tank system at Station No. 158. A pipeline leak was the suspected source of the release.
3. By Official Notice of February 24, 1986, the HMMD required Thrifty Oil Company to submit a written Unauthorized Release Report within 5 working days of receipt of the Official Notice and to submit status reports to the HMMD every 3 months until cleanup is complete.
4. By letter dated March 20, 1986, Regional Board staff requested the discharger to provide written confirmation of the leak within one week.
5. Thrifty Oil Company submitted confirmation of the leak to the Regional Board in a letter dated March 25, 1986. The discharger stated that on March 8, 1986 gasoline was observed seeping through a crack in the concrete at the main island area. Gas dispensing operations were immediately stopped and a vacuum truck was called to the site to recover the product. The leak source was identified as the regular leaded gasoline line. All the gasoline lines were replaced with fiberglass lines and pressure tested.
6. By letter dated May 8, 1986, Regional Board staff required the discharger to conduct a site assessment at Station No. 158 to determine the extent and magnitude of petroleum hydrocarbon contamination in the soil and ground water as a result of the fuel line leak detected March 8, 1986. The results of the investigation were required to be submitted no later than May 15, 1986.

7. A Regional Board staff internal memo dated May 13, 1986, states that Regional Board staff granted an extension of the site assessment report due date, as noted in Finding No. 6 above, from May 15, 1986 to July 15, 1986. The memo also states definition of the vertical extent of groundwater contamination would not be required at present.
8. On June 17, 1986, the Regional Board office received a "Report of Engineering Services, Thrifty Oil Company Station No. 158", dated June 16, 1986 and prepared by Woodward-Clyde Consultants for Straw and Gilmartin, counsel for Thrifty. The report contains the following information:
  - a. Four (4) borings drilled on June 4, 1986 met refusal in the underlying formation. The deepest boring was made to 9 1/2 feet.
  - b. Five (5) soil samples were collected from the 4 borings at depths of up to 5 feet and analyzed for Total Extractable Hydrocarbons (TEH) and organic lead. A high of 164.8 mg/kg (parts per million [ppm]) TEH was reported at a depth of 1 foot and the only detectable organic lead concentration was 0.24 ppm at a 2 foot depth.
  - c. Water was encountered in one boring at a depth of approximately 2 feet. No sheen was noted. A composited soil sample from this depth in the boring was analyzed for TEH, organic lead, and benzene, toluene, ethylbenzene, and xylenes (BTEX). Analytical results for the soil sample indicated 14.8 ppm TEH, 1.64 ppm benzene, 0.32 ppm toluene, 0.10 ppm ethylbenzene, and 0.17 ppm xylenes, and nondetectable organic lead.
  - d. A water sample was decanted off the composited soil sample noted in Finding No. 8 (c) above. Analytical results indicated 18.4 ppm TEH, 2.74 ppm benzene, and 0.79 ppm toluene. Analysis for phenols, required in Regional Board letter of May 8, 1986, reportedly could not be performed as the lab required at least a 500 ml volume sample for this analysis.
9. Product inventory data for the months of December 1985, January 1986, and February 1986 for Station No. 158 were transmitted to the Regional Board by letter dated August 29, 1986 from Straw and Gilmartin. Discrepancies range from +4592 gallons to -334 gallons for the regular, unleaded, and premium products at the station during the three months.
10. On April 28, 1989 staff of the HMMMD were on-site to observe removal of a 350 gallon waste oil tank from Station No. 158. Several small holes in the end of the tank were noted as well as approximately 2 gallons of ponded product in the excavation. Both the fill and native soils were saturated with product.

11. By Official Notice dated April 28, 1989, the HMMD directed Thrifty Oil Company to take immediate action to prevent further release at Station No. 158, determine the extent and impact of the release, and complete any required cleanup.
12. By letter dated June 6, 1989, the HMMD directed Thrifty Oil Company to submit written supplementary reports monthly for site activities at Station No. 158.
13. In a letter dated May 8, 1990 from the HMMD to Thrifty, the HMMD points out that all the supplementary monthly reports state only that Thrifty has requested bids for the site assessment work and that Thrifty intends to submit a workplan to the HMMD. The May 8, 1990 letter further states that unless Thrifty advises the HMMD why the site assessment work has not started, the HMMD expects that work will begin no later than June 15, 1990.
14. By letter dated January 15, 1991 from the HMMD to the Regional Board, the HMMD detailed the unsatisfactory progress by Thrifty Oil Company for site assessment at Station No. 158. The HMMD requested the Regional Board initiate enforcement action pursuant to California Health and Safety Code Division 20, Chapter 6.7, Section 25297 (b).
15. The "Comprehensive Water Quality Control Plan Report, San Diego Basin (9)" (hereinafter Basin Plan) was adopted by this Regional Board on March 17, 1975 and approved by the State Water Resources Control Board on March 20, 1975. Subsequent revisions to the Basin Plan have also been adopted by the Regional Board and approved by the State Board.
16. Station No. 158 is located in the Cholla Hydrologic Subarea of the San Diego Mesa Hydrologic Area of the Pueblo San Diego Hydrologic Unit, as described in the Basin Plan.
17. The Basin Plan has established the following beneficial uses for the surface waters in the Cholla Hydrologic Subarea:
  - a. Non-Contact Water Recreation
  - b. Wildlife Habitat
  - c. Preservation of Rare and Endangered Species

18. Although the Basin Plan does not recognize any existing beneficial uses of the ground water in the Cholla Hydrologic Subarea, the quality of the ground water underlying Station No. 158 is subject to the provisions of the State Water Resources Control Board's Resolution 68-16, "Statement of Policy with Respect to Maintaining High Quality Waters in California." Under the terms and conditions of Resolution 68-16, the pre-discharge groundwater quality of the Cholla Hydrologic Subarea must be maintained unless it is demonstrated that a decrease in water quality:
- (1) will be consistent with maximum benefit to the people of the state,
  - (2) will not unreasonably affect beneficial uses, and
  - (3) will not result in water quality less than prescribed in the Basin Plan or other adopted policies.
19. This enforcement action is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 21000 et seq.) in accordance with Section 15321, Chapter 3, Title 14, California Administrative Code.

IT IS HEREBY ORDERED THAT, pursuant to Section 13304 of the California Water Code, Thrifty Oil Company shall comply with the following Directives:

1. No later than October 1, 1991 the discharger shall provide to the Regional Board Executive Officer a technical report with the results of a comprehensive and complete site assessment for Station No. 158. The report must include the following information:
  - a. A site map showing the location of the underground storage tank system, the location of any former underground storage tank systems, the location and depth of underground utilities such as telephone and gas lines, and the location of all borings and monitoring wells.
  - b. A discussion of the products currently stored in the underground storage tank system and any other products that were historically stored.
  - c. Boring logs and monitoring well construction details for all borings and monitoring wells that are installed on-site or off-site.
  - d. A description of the soil types underlying the site, the depth to first ground water, groundwater gradient and flow direction, and free product thicknesses, where it is detected, in all of the wells.
  - e. A description of the soil and groundwater sampling protocol employed, including:
    - i. equipment used
    - ii. decontamination between borings and samples
    - iii. well purging procedure
    - iv. sample collection methods
    - v. sample preservation
    - vi. sample management
    - vii. quality assurance/quality control
  - f. A copy of the laboratory analytical results from a California Department of Health Services certified laboratory and the chains of custody for the soil and groundwater samples that are submitted for analysis. Soil and groundwater samples must be analyzed for the following constituents by the methods noted:

Total Petroleum Hydrocarbons	DOHS TPH Method
Benzene, Toluene, Ethylbenzene, Xylenes (BTEX)	EPA Method 8020
Total Lead	EPA Method 7421

- g. Sufficient analytical data from soil and groundwater samples to define the concentrations and vertical and horizontal extent of the petroleum hydrocarbon contamination in both the soil and ground water at the site, and any affected areas that exist off-site.
  - h. Documentation for the proper disposal of contaminated soil and/or ground water removed from the site.
  - i. A site map showing all adjacent land uses.
  - j. A description of groundwater supply wells and surface waters within 1/2 mile of the site.
- 2. In the interim period prior to complete implementation of remedial actions, the discharger shall immediately immobilize and recover all free product from the affected groundwater zone, and immobilize the dissolved product in the soil and ground water to prevent off-site migration of either free or dissolved product. Per Directive No. 5 of this Order, quarterly progress reports to the Regional Board Executive Officer must document these activities.
- 3. No later than December 1, 1991, the discharger shall submit a technical report to the Regional Board Executive Officer which identifies and discusses a range of remedial alternatives using best available technology to achieve the following cleanup levels, or better, for the petroleum hydrocarbon contamination in the ground water and soil at Station No. 158.
  - a. Complete removal of free product from the ground water.
  - b. Treatment and/or removal of soil with petroleum hydrocarbon constituents in excess of 1000 mg/kg Total Petroleum Hydrocarbons (TPH).
- 4. The alternatives for remedial action proposed by the discharger will be evaluated by Regional Board staff and, where appropriate, other regulatory agencies. Based on this evaluation, a cleanup alternative will be selected by Regional Board staff and the discharger notified to initiate its implementation.
- 5. In addition to the site assessment and remedial action alternatives reports required by Directive Nos. 1 and 3, respectively, the discharger shall submit quarterly progress reports to the Regional Board Executive Officer until the site has been adequately mitigated in accordance with Directive No.
- 6. The quarterly reports shall contain the following information:
  - a. A site map showing all boring and monitoring well locations, the estimated extent of both dissolved and free product in the ground water, hydrologic contours and groundwater gradient.

- b. Groundwater levels and product thicknesses, if any, in all of the wells.
- c. The analytical results from a California Department of Health Services certified laboratory for groundwater samples collected from all monitoring wells. Include all chain of custody documentation. All water samples must be analyzed for the following constituents by the methods noted:

Total Petroleum Hydrocarbons	DOHS TPH Method
Benzene, Toluene, Ethylbenzene, Xylenes (BTEX)	EPA Method 8020
Total Lead	EPA Method 7421
- d. A tabulated history of all soil and groundwater samples collected to date.
- e. The dates of product recovery, the quantity of product recovered for the quarter, the total to date, its ultimate disposal point, and hazardous waste manifests or receipts to document disposal.
- f. The quantity of ground water extracted for the quarter, the total to date, and its ultimate disposal point.
- g. The status of remediation for the site.

The quarterly progress reports shall be submitted to the Regional Board office in accordance with the following schedule:

<u>Reporting Period</u>	<u>Date Due</u>
January, February, March	April 30
April, May, June	July 31
July, August, September	October 31
October, November, December	January 31

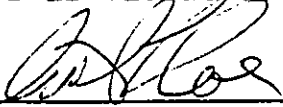
- 6. The discharger shall monitor the dissolved petroleum hydrocarbon contamination in the ground water and submit quarterly monitoring reports in accordance with Directive No. 5 of this Order until the Regional Board Executive Officer determines that residual contamination does not pose a significant threat to the waters of the state. If at any time during this post-cleanup monitoring the data indicate that the final cleanup levels have not been maintained, the discharger shall immediately resume appropriate remedial actions.

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7. The discharger shall dispose of all contaminated ground water and/or soil associated with Station No. 158 in accordance with all applicable local, state, and federal regulations.
8. The discharger shall obtain all necessary permits for assessment and remedial activities associated with the cleanup at Station No. 158.
9. All reports mentioned in the Directives above should be submitted to the Hazardous Materials Management Division of the County of San Diego Department of Health Services as well as to this Regional Board office.
10. Under Section 13350 of the California Water Code, any party who intentionally or negligently violates any Cleanup and Abatement Order issued by a Regional Board is subject to civil liability imposed by a Regional Board in an amount which shall not exceed five thousand dollars (\$5000) for each day the Cleanup and Abatement Order is violated.

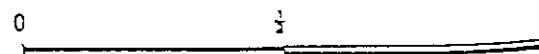
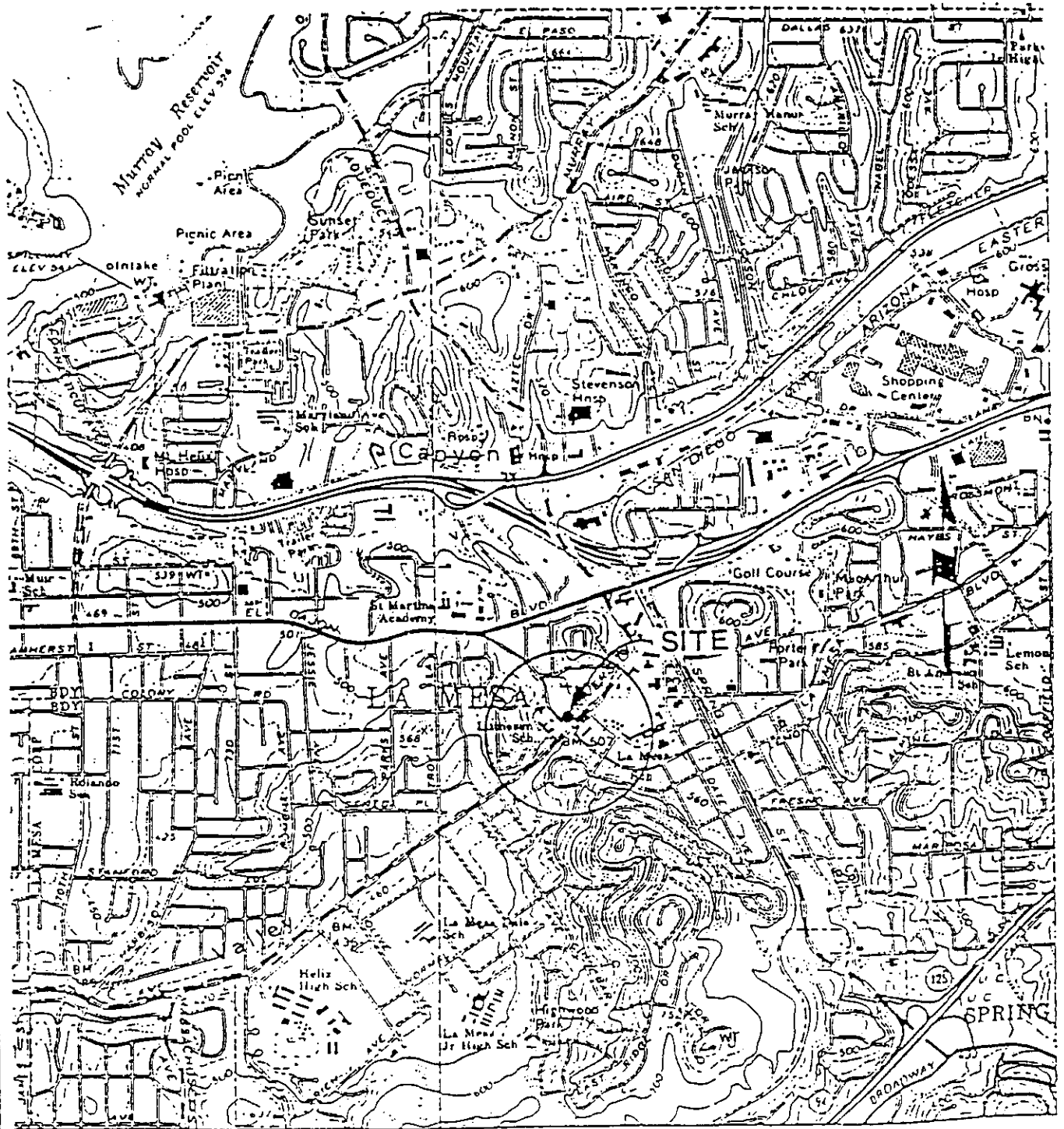
Ordered by: \_\_\_\_\_

  
Arthur L. Coe  
Executive Officer  
Regional Water Quality Control Board  
San Diego Region

Dated: May 29, 1991

MJB





Graphic Scale (Miles)

Base Map: USGS, La Mesa Quadrangle  
7.5 minute topographic series

SITE LOCATION MAP  
THRIFTY OIL STATION 158

